

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Nishon Laticia Lawton  
Aka Nishon Laticia Lawton Bey

*(In the space above enter the full name(s) of the plaintiff(s).)*

- against -

New Jersey Department of  
Community Affairs of Bridgeton  
Elena Gaines  
Frank Losey  
Carol Quinette  
Tracy McGovern Smith  
Yahoo Inc (Superna)

*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)*

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Nishon Laticia Lawton Bey</u>
	Street Address	<u>7127 Waldorf Ave</u>
	County, City	<u>Pennsauken, Camden County</u>
	State & Zip Code	<u>New Jersey, 08110</u>
	Telephone Number	<u>856-979-1166</u>

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AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH CLERK

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No  
(check one)

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Elena Gaines  
 Street Address 21 Rose Court  
 County, City Ocean, Toms River  
 State & Zip Code New Jersey, 08753-1301

Defendant No. 2

Name Frank Losey  
 Street Address 711 Opatut Court  
 County, City Ocean, Toms River  
 State & Zip Code New Jersey 08753

Defendant No. 3

Name Carol Quinette  
 Street Address 40 East Broad St.  
 County, City Cumberland, Bridgeton  
 State & Zip Code New Jersey 08302

Defendant No. 4

Name Tracy McGovern Smith  
 Street Address 40 East Broad St (Former address)  
 County, City Cumberland Bridgeton  
 State & Zip Code New Jersey 08302

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions ☐ Diversity of Citizenship  
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Title 18 Section 241, Title 18 Section 242

Title 42, USC Section 3631, In connection with case:  
Title 18 U.S. Code 2701, Title 18 USC 2701(b)(1) Abuse of Process

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New Jersey  
 Defendant(s) state(s) of citizenship New Jersey

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Deptford New Jersey

B. What date and approximate time did the events giving rise to your claim(s) occur? September 10th 2012  
2012 an illegal eviction was filed that began a pattern of illegal evictions to follow.

c. Facts: As a result of the illegal eviction that was filed on

What happened to you?

September 10th 2012 in retaliation for me warning the landlord of 2030 County House Road Deptford New Jersey, that I would not be paying him for the month of September due to his failure to make repairs and his enlisting some of his township friends in a harassment campaign that I later found to be not of the landlord's making but by another entity that I am addressing with the Department of Homeland Security now, that is why the landlord is not named in the suit; however, the state workers who are named in this suit have a fiduciary duty to respect the rights of Housing Choice Voucher Recipients. Violation of Rule 2A:18-56 Notice to Quit which was never given due to an immediate same-day retaliatory eviction.

Who did what?

Was anyone else involved?

My children, immediate family, Human Rights organizations and others outside of immediate family can testify to the condition of the house, our displacement and homelessness every since November 1st 2012.

Who else saw what happened?



#### IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Emotional Distress, homelessness, mistrust for those entrusted with our livelihood; loss of household items, keepsakes and furniture. Children suffered greatly with changing schools twice and living in 4 different locations with a significant reduction in school performance and grades.  
 \*After emailing Frank Lacey about a Fair Hearing, he told me in writing that I am not guaranteed a hearing or reinstatement of my voucher and referred me to Elena Guines who said she was looking into things but has failed to contact me since sending her a fax of my request for fair hearing from November 2012. After this my email was hacked to get rid of evidence of the conversations.

#### V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

The Department of Community Affairs has allowed my housing voucher to be handled by employees who are from different areas but all live and are from the same area with what would appear to be a racially fueled agenda given the facts.

Housing is a Human Right, especially for the descendants of the indigenous peoples of America, not to be arbitrarily confiscated by those with racial agendas who have no real allegiance to the natural inhabitants of this country. I am seeking expectation damages, stemming from \$1,250.00 monthly, which was the monthly rental allotment from the Department of Community Affairs times 3 years; which totals \$45,000 plus 10,000 dollars for loss of personal property, such as household goods, keepsakes and furniture.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 8 day of December, 2015.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

Dishon-hatia : Lawton Bay ucc-1-308

7127 Waldorf Ave  
Pennsauken, NJ 08110

856-979-1166

NA

Dishonlatia.lawton@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff:

Dishon-hatia : Lawton Bay ucc-1-308